Proposed Specific Regulatory Level Chemical Causing Cancer: Glyphosate

Published Name:
Beate Nilsen

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From: Beate
To: P65Public Comments
Subject: GLYPHOSATE NSRL
Date: Thursday, May 11, 2017 9:45:23 AM

Monsanto Weed Killer Roundup Faces New Doubts on Safety in Unsealed Documents

MARCH 14, 2017 The court documents included Monsanto's internal emails and email traffic between the company and federal regulators. The records suggested that Monsanto had **ghostwritten research that was later attributed to academics** and indicated that a senior official at the Environmental Protection Agency had worked to quash a review of Roundup's main ingredient, glyphosate, that was to have been conducted by the United States Department of Health and Human Services.

> "We would be keeping the cost down by us doing the writing and they would just edit & sign their names so to speak,"

Continue reading the main story

"Low dose" is meaningless because glyphosate works at the molecular level; molecule by molecule, it can pass the cell wall and be randomly mis-incorporated into protein structures. Think of this, every 1 ppb (1 ug/L) of glyphosate technical acid (fluid) contains 3,561,000,000,000 molecules; each of these molecules circulates and can mis-incorporate into peptides and proteins. This mis-incorporation results in malformed proteins that no longer function properly in metabolism or other regulatory processes. The overall consequences are unpredictable and can be related to many diseases and disorders (= "medical chaos"). This easily explains the remarkable correlations between the rise in glyphosate usage on core crops in the United States and a long list of debilitating chronic human diseases. Clearly, this is not conventional toxicology and glyphosate must be evaluated differently. Glyphosate is found in all bodily fluids including blood, lymph, cerebrospinal fluid, urine, and milk. It bioaccumulates in all tissues, glands and organs.

Basically, there is no safe level of glyphosate.

Yet, intense and continuous use of glyphosate has resulted in the emergence of GLY-resistant weeds, or "superweeds" that are now found on nearly 100 million acres in 36 states (Landrigan & Benbrook 2015). Farmers respond by treating fields with higher doses and more applications and/or with multiple herbicides and/or with more toxic herbicides. And the number of resistant species keeps increasing, as does the overall cost of weed control. Consequently, this leads to higher levels of GLY residue in

foods and feeds. ~ Stephen Frantz

"Claudia Angulo is a mother from Orange Cove, CA, whose kids attend schools near heavy pesticide use on citrus groves.

In collaboration with the local nonprofit El Quinto Sol De America, a journalist helped Claudia conduct a biomonitoring study of her son — and they found over 50 different pesticides in his body."

Claudia: My daughter has experienced a similar issue while she's at school, where she sometimes gets a major bloody nose after reporting what she calls, an "ugly smell." I went to her school and asked to keep the children indoors when the chemical smell could easily be perceived.

During spray season, children are the most vulnerable. At school, headaches and bloody noses are common, but go unreported. I've even seen some children pass out. I'm a parent volunteer at the school, and I've seen how the number of kids going in to see a nurse increases during spray season. School officials attribute this spike to heat stress even if the weather is a cool 75 degrees. But during spray season, more kids see the nurse."

All the Best, Beate Nilsen
[redacted], Malibu, CA 90265
Click to Feed the Hungry: Free !!

From:	Beate
To:	P65Public Comments
Subject:	Glyphosate NSRL
Date:	Wednesday, May 03, 2017 3:37:59 PM
Attachments:	image.png anresco_reports_food_testing_2016.pdf

Your proposed level for Glyphosate is basically twice what independent scientists in the EU think is too high. The Canadian Food Inspection Agency (CFA) has been testing Canadian, US and other countries' foods for glyphosate residues for a number of years. A recent publication of that data shows that "Canada and USA produce the most toxic foods on the planet, with regard to glyphosate contamination." For instance, did you know wheat is sprayed with it only 7-10 days before harvest to make it easier to process?

"This is the worst possible time to apply a herbicide because it causes the glyphosate to be absorbed into the food crop directly. In other words, the glyphosate can't be washed off later as it has become part of the food." ~ Cornucopia Institute. That means it is delivered to our doors that way, in bread and cereal products.

The recent news that Cheerios have the most glyphosate of anything on our supermarket shelves is pretty heinous, as that's the first go-to food mothers feed pre-toddlers. They're easy to transport in a baggie and easy for the baby to pick up and manage by itself. Of course these mothers think it's SAFE and healthy for their child to eat. Is your child eating it? Now what?

The first ever independent, FDA-registered laboratory food testing results for glyphosate residues in iconic American food brands finds alarming levels of glyphosate contam-ination and reveals the inadequacy of current food safety regulations relating to allowable pesticide residues:

http://foodbabe.com/wp-content/uploads/2016/11/2016-11-14_1536.png

However, it seems to have suddenly terminated study.
http://www.huffingtonpost.com/**carey-gillam/fda-suspends-glyphosate-**r_b_12913458.html

- glyphosate is an endocrine disruptor, which interrupts hormone development and leads to reproductive problems, early onset puberty, obesity, diabetes, and some cancers. When it comes to endocrine disruptors, very small exposures are the most damaging, so "the dose makes the poison" mantra does not apply!
- Glyphosate is a broad-spectrum antibiotic killing the good bacteria in your gut. Poor gut health is linked to inflammation and a whole host of diseases. As GMOs laced with glyphosate are commonly fed to farm animals, this could very well be contributing to

antibiotic-resistant bacteria.

- It binds with vital nutrients in the soil (like iron, calcium, manganese, zinc) and prevents plants for taking them up. Glyphosate is thereby making food less nutritious!

• Glyphosate Bio-Accumulates in Major Organs and Bones.... Residues Found in Food, Urine, Breast Milk, Rainwater, Rivers, Tap Water and Tampons.

It's important for individuals and parents to understand that glyphosate contamination cannot be removed by washing and is not broken down by cooking or baking. Glyphosate residues can remain stable in food for a year or more, even if the foods are frozen or processed.

Glyphosate was Originally Patented to Clean Pipes, Like Drano – 1964. It was 10 years later that a use was discovered for directed interruption of plant development through metabolic poisoning...

In 2010, Monsanto discovered potential antibiotic or antimicrobial activity. Could it be that's what's in our massively marketed anti-microbial soaps which, along w. antibiotic use in feedlot animals, is causing the insen-sitivity to antibiotics our hospital trauma departments are reeling from? There is a paper-trail requirement now in ERs ~ CDC's Antibiotic Formulary Restrictions ~ to pinpoint which antibiotic was prescribed to which infection and *why,* specifically for this reason.

["effective January 1, 2017. Current scientific literature emphasizes the need to reduce the use of inappropriate antimicrobials in all health care settings due to antimicrobial resistance.

According to the World Health Organization (WHO): "Antimicrobial resistance threatens the effective prevention and treatment of an ever-increasing range of infections caused by bacteria, parasites, viruses and fungi."1

I think we need to order a Do No Harm assessment for this chemical. Here's the attachment below for file from

anresco LABORATORIES since 1943 **Certificate of Analysis**

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All the Best,

Beate Nilsen
[redacted]. Malibu CA 90265
Click to Feed the Hungry: Free !!

Certificate of Analysis

April 29, 2016

FOOD DEMOCRACY NOW!

Anresco No. 320160506

Sample Information

Product

Eleven Samples of Chips Marked As Follows:

1. Lay's Potato Chips Classic
2. Lay's Barbecue Flavored Potato Chips
3. Lay's Cheddar & Sour Cream Flavored Potato Chips
4. Lay's Kettled Cooked Original
5. Lay's Kettled Cooked Original 40% Less Fat(Sea Salt and Vinegar)
6. Ruffles Original
7. Ruffles Cheddar and Sour Cream
8. Doritos (original- Nacho Cheese - 10 oz)
9. Doritos Cool Ranch
10. Fritos (original) (100% Whole Grain)
11. Sun Chips

Sampling
Received

Received from Client.
March 29, 2016

Analytical Results

Analysis
Method

Glyphosate and Aminomethylphosphonic Acid (AMPA)
Simultaneous LC-MS/MS Analysis of Glyphosate, Glufosinate, and Their Metabolic Products in Beer, Barley Tea, and Their Ingredients
Biosci, Biotechnology, Biochem 77 (11), 2218-2221, 2013

Analysis Date
Analyst

March 29, 2016 to April 29, 2016
Edmund Moy

Findings

Sample ID	Amount Glyphosate (ppb)	Amount AMPA (ppb)
1. Lay's Potato Chips Classic	No Recovery	No Recovery
2. Lay's Barbecue	No Recovery	No Recovery
3. Lay's Cheddar & Sour Cream	No Recovery	No Recovery
4. Lay's Kettled Cooked Original	452.71*	No Recovery
5. Lay's Kettled Cooked Sea Salt and Vinegar	No Recovery	No Recovery
6. Ruffles Original	No Recovery	No Recovery
7. Ruffles Cheddar and Sour Cream	No Recovery	No Recovery
8. Doritos Nacho Cheese	No Recovery	No Recovery
9. Doritos Cool Ranch	481.27*	No Recovery
10. Fritos (original) (100% Whole Grain)	174.71*	No Recovery
11. Sun Chips		No Recovery

Limit of Quantitation: 5 ppb

*These samples exhibit very low recovery and/or response. The above amounts found are rough extimates at best and may not represent an accurate representation of the sample.

Reported by
Anresco, Inc.

Vu Lam
Senior Chemist

ANRESCO, INCORPORATED INCORPORATED OCTOBER 1 1978 CALIFORNIA

Edmund Moy
Senior Chemist

ANRESCO, INCORPORATED INCORPORATED OCTOBER 1 1978 CALIFORNIA

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Certificate of Analysis

April 15, 2016

FOOD DEMOCRACY NOW!

Anresco No. 320160503

Sample Information

Product	Five Samples of General Mills Marked As Follows: 1. Cheerios - 100% Whole Grain Oats (8.9 oz) 2. Honey Nut Cheerios - Whole Grain Oats - (12.25 oz) 3. Wheaties - Toasted whole Wheat Flakes (15.6 oz) 4. Trix (10.7 oz) 5. Total Whole Grain (10.6 oz)
Sampling	Received from Client.
Received	March 29, 2016

Analytical Results

Analysis	Glyphosate and Aminomethylphosphonic Acid (AMPA)
Method	Simultaneous LC-MS/MS Analysis of Glyphosate, Glufosinate, and Their Metabolic Products in Beer, Barley Tea, and Their Ingredients Biosci, Biotechnology, Biochem 77 (11), 2218-2221, 2013
Analysis Date	April 11, 2016 to April 15, 2016
Analyst	Edmund Moy

Findings

Sample ID	Amount Glyphosate (ppb)	Amount AMPA (ppb)
1. Cheerios	1125.3 ppb	26.4 ppb
2. Honey Nut Cheerios	670.2 ppb	14.5 ppb
3. Wheaties	31.2 ppb	None Detected
4. Trix	9.9 ppb	None Detected
5. Total Whole Grain	Below LoQ	None Detected

Limit of Quantitation: 5 ppb

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FOOD DEMOCRACY NOW!

Anresco No. 320160504

Sample Information

Product	Five Samples of Kelloggs Marked As Follows: 1. Corn Flakes (18 oz) 2. Raisin Bran (Post) Whole Grain Wheat & Bran Cereal (20 oz) 3. Kashi - Organic Promise (16.3 oz) 4. Special K - Original Toasted Rice Cereal (12 oz) 5. Frosted Flakes Kelloggs (10.5 oz)
Sampling	Received from Client.
Received	March 29, 2016

Analytical Results

Analysis	Glyphosate and Aminomethylphosphonic Acid (AMPA)
Method	Simultaneous LC-MS/MS Analysis of Glyphosate, Glufosinate, and Their Metabolic Products in Beer, Barley Tea, and Their Ingredients Biosci, Biotechnology, Biochem 77 (11), 2218-2221, 2013
Analysis Date	April 11, 2016 to April 15, 2016
Analyst	Edmund Moy

Findings

Sample ID	Amount Glyphosate (ppb)	Amount AMPA (ppb)
1. Corn Flakes	78.9 ppb	Below LoQ
2. Raisin Bran	82.9 ppb	None Detected
3. Kashi - Organic Promise	24.9 ppb	None Detected
4. Special K	74.6 ppb	None Detected
5. Frosted Flakes	72.8 ppb	None Detected

Limit of Quantitation: 5 ppb

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April 29, 2016

FOOD DEMOCRACY NOW!

Anresco No. 320160506

Sample Information

Product	Ten Samples of Cookies Marked As Follows:
	1. Annies Gluten Free - Cocoa and Vanilla Bunny Cookies
	2. Nabisco Barnum's Animals Crackers
	3.Nabisco Oreo Original
	4. Nabisco Oreo Double Stuff
	5. Nabisco Oreo Double Stuff Golden
	6. Nabisco Chips Ahoy!
Sampling	7. Little Debbie - Oatmeal Creme Pies
	8. Kashi Oatmeal Dark Chocolate - Soft Baked Cookies
	9.Snackwells Devil's Food Cookies
	10. Lucy's Oatmeal Cookies
Received	Received from Client. March 29, 2016
Analysis Method	Glyphosate and Aminomethylphosphonic Acid (AMPA) Simultaneous LC-MS/MS Analysis of Glyphosate, Glufosinate, and Their Metabolic Products in Beer, Barley Tea, and Their Ingredients Biosci, Biotechnology, Biochem 77 (11), 2218-2221, 2013
Analysis Date	March 29, 2016 to April 29, 2016
Analyst	Edmund Moy

Analytical Results

Findings

Sample ID	Amount Glyphosate (ppb)	Amount AMPA (ppb)
1. Annies Gluten Free - Cocoa and Vanilla Bunny Cookies	55.13*	No Recovery
2. Nabisco Barnum's Animals Crackers	None Detected	No Recovery
3. Nabisco Oreo Original	289.47*	No Recovery
4. Nabisco Oreo Double Stuff	140.90*	No Recovery
5. Nabisco Oreo Double Stuff Golden	215.4*	No Recovery
6. Nabisco Chips Ahoy!	None Detected	No Recovery
7. Little Debbie - Oatmeal Creme Pies	264.28*	No Recovery
8. Kashi Oatmeal Dark Chocolate - Soft Baked Cookies	275.58*	No Recovery
9. Snackwells Devil's Food Cookies	None Detected	No Recovery
10. Lucy's Oatmeal Cookies	452.44*	No Recovery

Limit of Quantitation: 5 ppb

*These samples exhibit very low recovery and/or response. The above amounts found are rough extimates at best and may not represent an accurate representation of the sample.

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April 29, 2016

FOOD DEMOCRACY NOW!

Anresco No. 320160506

Sample Information

Product	Ten Samples of Crackers Marked As Follows:
	1. Pepperidge Farm - Goldfish Crackers - (original cheddar)
	2. Pepperidge Farm – Goldfish Crackers - (colors)
	3. Pepperidge Farm – Goldfish Crackers - (Cheddar Made with Whole Grains)
	4. Cheez-Its (Original)
	5. Cheez-Its Whole Grain
	6. Ritz
	7. Triscuits
	8. Stacy's Pita crackers
	9. 365 Whole Foods Golden Round crackers
	10. Back to Nature Crispy cheddar crackers
Sampling	Received from Client.
Received	March 29, 2016

Analytical Results

Analysis Method	Glyphosate and Aminomethylphosphonic Acid (AMPA) Simultaneous LC-MS/MS Analysis of Glyphosate, Glufosinate, and Their Metabolic Products in Beer, Barley Tea, and Their Ingredients Biosci, Biotechnology, Biochem 77 (11), 2218-2221, 2013
Analysis Date	March 29, 2016 to April 29, 2016
Analyst	Edmund Moy

Findings

Sample ID	Amount Glyphosate (ppb)	Amount AMPA (ppb)
1. Goldfish Crackers - original	18.40	No Recovery
2. Goldfish Crackers - colors	8.02	No Recovery
3. Goldfish Crackers - Whole Grains	24.58	No Recovery
4. Cheez-Its (Original)	24.60	No Recovery
5. Cheez-Its Whole Grain	36.25*	No Recovery
6. Ritz	270.24	No Recovery
7. Triscuits	89.68	No Recovery
8. Stacy's Pita crackers	812.53	No Recovery
9. 365 Whole Foods Golden Round	119.12*	No Recovery
10. Back to Nature Crispy cheddar	327.22*	No Recovery

Limit of Quantitation: 5 ppb

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